



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

OCT 16 2012

Gerardo C. Rios, Chief
Permits Office (AIR-3)
U.S. EPA - Region IX
75 Hawthorne St
San Francisco, CA 94105

Re: Notice of Final Action - Minor Title V Permit Modification
District Facility # S-2234
Project # S-1090862

Dear Mr. Rios:

The Air Pollution Control Officer has modified the Title V permit for Occidental of Elk Hills, Inc. by incorporating S-2234-178-0, '-178-1, '-179-0, and '-179-1. Occidental of Elk Hills, Inc. received Authority to Construct permits (ATCs) for the installation of one 7 MMBtu/hr and one 19 MMBtu/hr gas-fired process heaters for their 35R gas plant. The 19 MMBtu/hr heater (S-2234-178-0) and one of the 7 MMBtu/hr heaters (S-2234-179-0) have been implemented and source tested. However, the process to be served by these heaters is not in operation and OEHI submitted applications and received ATCs to designate the two heaters dormant emissions units (S-2234-178-1, '-179-1). Permits to Operate for the existing units are being issued, reflecting their status as dormant emissions units.

Enclosed is the modified Title V permit. The application and proposal were sent to US EPA Region IX on August 21, 2012. No comments were received following the District's preliminary decision on this project.

Northern Region

4800 Enterprise Way
Modesto, CA 95356-8718

Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)

1990 E. Gettysburg Avenue
Fresno, CA 93726-0244

Tel: (559) 230-6000 FAX: (559) 230-6061

www.valleyair.org

Southern Region

34946 Flyover Court
Bakersfield, CA 93308-9725

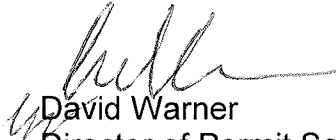
Tel: (661) 392-5500 FAX: (661) 392-5585

OCT 16 2012

Mr. Gerardo C. Rios
Page 2

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Sincerely,

A handwritten signature in black ink, appearing to read "David Warner", is written over the printed name.

David Warner
Director of Permit Services

DW:spl

Enclosures



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

OCT 16 2012

Dennis Champion
Occidental of Elk Hills, Inc.
10800 Stockdale Hwy
Bakersfield, CA 93311

**Re: Notice of Final Action - Minor Title V Permit Modification
District Facility # S-2234
Project # S-1090862**

Dear Mr. Champion:

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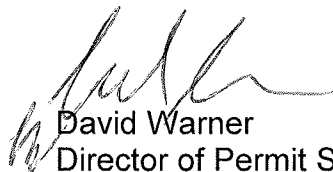
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Mr. Dennis Champion
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Sincerely,

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David Warner
Director of Permit Services

DW:spl

Enclosures

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-2234-178-3

EXPIRATION DATE: 10/31/2016

SECTION: NE35 **TOWNSHIP:** 30S **RANGE:** 23E

EQUIPMENT DESCRIPTION:

19 MMBTU/HR MOHAWK PROCESS EQUIPMENT NATURAL GAS-FIRED MOL-SIEVE PROCESS HEATER WITH ZEECO MODEL GLSF BURNER, #F-207

PERMIT UNIT REQUIREMENTS

1. While dormant, the fuel line shall be physically disconnected from the unit. [District Rule 2080] Federally Enforceable Through Title V Permit
2. Permittee shall submit written notification to the District upon designating the unit as dormant or active. [District Rule 2080] Federally Enforceable Through Title V Permit
3. While dormant, normal source testing shall not be required. [District Rule 2080] Federally Enforceable Through Title V Permit
4. Upon recommencing operation of this unit, normal source testing shall resume. [District Rule 2080] Federally Enforceable Through Title V Permit
5. Any source testing required by this permit shall be performed within 60 days of recommencing operation of this unit, regardless of whether the unit remains active or is again designated as dormant. [District Rule 2080] Federally Enforceable Through Title V Permit
6. Records of all dates and times that this unit is designated as dormant or active, and copies of all corresponding notices to the District, shall be maintained, retained for a period of at least five years, and made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
7. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
8. Emission rates from this unit shall not exceed any of the following limits: NO_x (as NO₂) - 0.015 lb/MMBtu or 12 ppmv @ 3% O₂; VOC - 0.019 lb/MMBtu; CO - 0.084 lb/MMBtu or 114 ppmv @ 3% O₂; PM₁₀ - 0.013 lb/MMBtu. [District Rules 2201, 4305, and 4306] Federally Enforceable Through Title V Permit
9. This unit shall only be fired on natural gas with a sulfur content which does not exceed 1.0 grains/ 100 scf. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Copies of all fuel invoices, gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2201] Federally Enforceable Through Title V Permit
11. If the heater is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the heater shall be determined using ASTM method D 1072, D 3031, D 4084, D 3246 or double GC. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

12. If the heater is not fired on PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Source testing to measure natural gas combustion NOx and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
14. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
15. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
16. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
17. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
18. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, stack gas moisture content - EPA Method 4, stack gas velocities - EPA Method 2, and fuel gas sulfur content - ASTM D3246 or double GC for H2S and mercaptans. [District Rules 1081, 4305, and 4306] Federally Enforceable Through Title V Permit
19. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
20. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
21. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

22. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
23. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 3% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
24. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, and 4306] Federally Enforceable Through Title V Permit
25. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NO_x emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NO_x emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit
26. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070 and 4320] Federally Enforceable Through Title V Permit
27. On and after July 1, 2012, the permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contacts may be used to satisfy this requirement, provided they establish the fuel parameters mentioned above. [District Rule 4320] Federally Enforceable Through Title V Permit

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-2234-179-3

EXPIRATION DATE: 10/31/2016

SECTION: NE35 **TOWNSHIP:** 30S **RANGE:** 23E

EQUIPMENT DESCRIPTION:

7 MMBTU/HR MOHAWK PROCESS EQUIPMENT NATURAL GAS-FIRED MOL-SIEVE PROCESS HEATER WITH ZEECO MODEL GLSF BURNER, #F-213

PERMIT UNIT REQUIREMENTS

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